

4. In-house counsel for Allscripts immediately followed up with Plaintiff and explained the situation. Allscripts then formally retained its current outside counsel to defend it in the action.

5. The undersigned counsel for Defendant was retained on or about December 13, 2016 and contacted counsel for Plaintiff that same day to discuss the case. The parties first spoke on or about December 16, 2016. In the course of those discussions, Allscripts also offered to provide information to Plaintiff concerning the allegations in the Complaint with the hope that the parties can reach an early, informal resolution of Plaintiff's claim.

6. Plaintiff indicated he is amenable to considering the information Allscripts is providing. The parties will exchange the information this week and continue their informal discussions.

7. For that reason, the parties respectfully request the Court permit Allscripts up to and including January 30, 2017 to respond to Plaintiff's Complaint.

8. On October 27, 2016, the Court set an initial case status conference for January 10, 2017. (ECF No. 2). In connection with the initial case status hearing, the parties are required to make certain filings, including an Initial Status Report and a Joint Jurisdictional Status Report.

9. In light of the fact that the parties are holding informal discussions and have requested an extension of time for Defendant to respond to the pleading, the parties further respectfully request the Court reschedule the initial case management conference to a date convenient to the Court after a responsive pleading has been filed.

10. This is the parties' first request for an extension from this Court. This motion is made in the interest of justice, not to delay the proceedings, and will not prejudice any party.

WHEREFORE, for the foregoing reasons, the parties respectfully request that this Court grant an extension of time for Defendant to answer or otherwise plead to January 30, 2017 and reset the initial status hearing for a date thereafter convenient to the Court.

Dated: January 3, 2017

Respectfully submitted,

By: /s/ Benjamin H. Richman

By: /s/ Livia M. Kiser

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CERTIFICATE OF SERVICE

I, Livia M. Kiser, hereby certify that on January 3, 2017, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Livia M. Kiser
Livia M. Kiser

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